

Recent Rule Interpretations Now Being Enforced by Field Operations

The Washington State Gambling Commission has recently implemented new processes in order to address the concerns over consistency in rule interpretations. These interpretations have been circulated to all agents and are the guidelines under which they are operating.

Please note that these are guidelines and not policies, and are subject to review and change. Many of them may be included as rule changes, as we review our rules process in the future. If you have any questions, please feel free to call Cally Cass-Healy, Assistant Director at 360-486-3579.

Rule interpretations within the last three months include:

WAC 230-12-045: Promotions for Gambling Activities – Match Play Coupons

A promotion may offer cash, merchandise, and/or discounted coupons to encourage a player to begin or continue play in a gambling activity, as stated in WAC 230-12-045 (1).

A typical coupon offered as a promotion is “Match Play” coupons. The “Match Play” offers the player the opportunity to be paid more for a winning wager, but does not require them to wager more than the maximum bet allowed. Match Play coupons have *no monetary value* and a player cannot “double down” on that portion of the wager. The player, however, can still “double down” on the chips wagered. The coupon is *not* considered part of the player’s wagering in determining the amount wagered by the player.

If a card room wants to offer this special bonus to a player who wagers the maximum allowed, this is acceptable.

WAC 230-25-050, 230-02-505: Can Poker be played at a RGA or FRE?

Poker *can not* be played at either a Recreational Gaming Activity (RGA) or a Fund Raising Event (FRE).

All gambling activities where one player wagers against another player are prohibited at Fund Raising Events (FRE). This includes poker and all poker tournaments from being play at a FRE.

A Recreational Gaming Activity (RGA) is a non-gambling activity which only uses devices authorized for use in a Fund Raising Event (FRE). Since poker is not authorized for FRE use, it is not allowed in a RGA.

WAC 230-40-885 (2): Count Team Members

Any licensed employee can be a Count Team Member as long as they are not in the surveillance department or have duties in the accounting department that include reviewing, approving, or preparing records used in the count process. There is no limitation on how many of the count staff are from one department.

All surveillance employees are excluded because of their access to the recording equipment and tapes of the count.

Accounting staff are excluded because they would be in a position to alter documents recording the count.

WAC 230-40-815 (4): Changing Table Layouts

Any changes to the licensee’s system of internal controls must be submitted to commission staff and be approved prior to implementation.

The licensee must send the layout changes prior to approval. After the changes have been sent, the agent has the option of verbal or written approval. The agent will verify the changes on their next visit to the licensee.

When the licensee wants to add a new game that has not yet been approved by the WSGC, the agent must wait to approve the layout changes until the *game* has been approved.